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May 26, 2017

VIA ECF

The Honorable Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square New York, NY 10007

Re: *In Re Terrorist Attacks on September 11, 2001*; 03-md-1570 (GBD)(SN)
The Charter Oak Fire Ins. Co. et al v. Al Rajhi Bank et al; 1:17-cv-02651
Sheps Law File No.: 7094

Dear Judge Netburn:

We represent The Charter Oak Plaintiffs in the above referenced matter (the “Charter Oak Action”). The Charter Oak Action is a case that has been more recently filed and has been joined within the Multi District Litigation.

In accordance with this Court’s Order dated May 16, 2107, *ecf* no. 3584, we write to provide a status update as to my clients’ claims.

In order to maintain consistency, on May 19, 2017, we adopted the jurisdictional, liability, and factual allegations presented in *Underwriting Members of Lloyd’s Syndicate 2. et al. v. Al Rajhi Bank*, 16-cv-7853 (GBD)(SN) (“Lloyd’s I”) (ECF 55) with respect to Non-Sovereign Defendants Al Rajhi Bank, National Commercial Bank and Saudi Binladin Group. Likewise, on the same day, Plaintiffs utilized the Notice to Conform and adopted the Consolidated Amended Complaint asserting claims against the Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia & Herzegovina. Plaintiffs agree that their complaint shall be deemed subject to any motion to dismiss with respect to all of these aforementioned defendants.

There are several other Non-Sovereign Defendants asserted in our initial pleading that we would also like to report on at this time.

With respect to the first group of Non-Sovereign Defendants- The Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Dallah Avco Trans Arabia, we have spoken with each of their respective counsel concerning a Stay of Plaintiffs’ claim for a period of six (6) months. During such time we would not serve the complaint nor require an Answer or any response from them. We would take this time to review the claims being asserted against each of them to make a final decision whether to proceed forward. With this agreement we could avoid the

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spending of any legal costs for these defendants. As part of this agreement, we would also agree to not serve any additional discovery requests upon these defendants if the action is resumed and be bound by any court decisions that are filed while the main action against them continues. Counsel for three of the defendants have advised they would not oppose such a Stay. Counsel for the fourth defendant, World Assembly of Muslim Youth, was on vacation until late yesterday afternoon and understandably needed to speak further with his client but had no immediate objection to this approach. Counsel thought he would hear back by Wednesday of next week. We hope that with this we can maintain consistency and efficiency and proceed forward.

Regarding Mohamed Binladin Company, Mohamed Binladin Organization, and Al Haramain Islamic Foundation, those parties appear to not have counsel at this time. We understand they may be defunct and are seeking more information at this time.

Thank you for your time and consideration.

Very truly yours,

SHEPS LAW GROUP, P.C.



Robert C. Sheps, Esq.

cc: All Counsel *via ECF*